

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

AMBER MARTINS,

Plaintiff,

v.

CIVIL ACTION FILE
NO. 1:17-cv-04188-TWT

C.R. ENGLAND, INC.,

Defendant.

/

**JOINT MOTION FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Come Now, Defendant C.R. England, Inc. and Plaintiff Amber Martins, by and through their undersigned counsel, and file this Joint Motion for Extension of Time to Respond to Complaint, and respectfully show the Court as follows:

1. Plaintiff filed this action on October 20, 2017 and served Defendant with process in this case on October 25, 2017.
2. Since the filing of the Complaint, the Parties have discussed the facts of the matter and have engaged in productive discussions regarding its potential resolution.

3. Given their efforts to resolve the matter, the Parties agreed to an extension for Defendant to answer or otherwise respond to the Complaint up to and through and including December 14, 2017.

4. The requested extension is made for good cause and will not prejudice either party.

5. A proposed order is attached hereto as Exhibit A.

WHEREFORE, the Parties respectfully move the Court for an Order granting this Joint Motion for Extension of Time to Respond to Complaint up to and through December 14, 2017.

Respectfully submitted, this 22nd day of November, 2017.

/s/ Scott W. Zottneck
Scott W. McMickle
Georgia Bar No. 497779
Scott W. Zottneck
Georgia Bar No. 700008
McMickle, Kurey & Branch, LLP
200 South Main Street
Alpharetta, Georgia 30009
Telephone: 678-824-7800
Facsimile: 678-824-7801
Email: swm@mkblawfirm.com
Email: szottneck@mkblawfirm.com
Attorneys for Defendant

/s/ Octavio Gomez
(signed with written permission by Scott W. Zottneck)
Octavio ("Tav") Gomez, Esquire
Georgia Bar No. 617963
Morgan & Morgan, Tampa, P.A.
201 North Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505
Facsimile: (813) 223-5402
Email: tgomez@forthepeople.com
Email: fkerney@forthepeople.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2017, the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** was electronically filed with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to counsel of record, including:

Mr. Octavio (“Tav”) Gomez
Morgan & Morgan, Tampa, P.A.
201 North Franklin Street, 7th Floor
Tampa, FL 33602
Attorneys for Plaintiff

This 22nd day of November, 2017.

/s/ Scott W. Zottneck
For the Firm